



City of Seattle Seattle Planning Commission

Gregory J. Nickels, Mayor
Marty Curry, Executive Director

John Owen, Chair
George Blomberg,
Vice Chair
Anjali Bhagat
Angela Brooks
Raymond Connell
Matthew Kitchen
Jeanne Krikawa
Lyn Krizanich
Denise Lathrop
Joe Quintana
Stephen G. Sheehy
Mimi Sheridan
Tony To
Paul Tomita
Marty Curry,
Executive Director
Barbara E. Wilson,
Analyst

October 7, 2003

RE: Summary of Planning Commission Monorail DEIS Recommendations

Below you will find the Summary of the Seattle Planning Commission's recommendations on the Seattle Monorail Project Draft Environmental Impact Statement (DEIS), taken from its detailed comments and letter to the Seattle Monorail Project.

The Planning Commission recognizes the important role the EIS process plays in laying out the project's potential impacts and mitigation measure, and in providing the public an opportunity to weigh in on the document. The Final EIS becomes the blueprint for SMP, the City, and the community as the project moves into design and implementation. It is particularly important in identifying who is responsible for mitigating impacts, particularly those that go beyond the physical structure of the monorail.

The Planning Commission has identified many gaps in the analysis of impacts and identification of mitigation measures throughout the DEIS document. We believe it is critical that the FEIS seriously address these concerns for it to perform its intended function of guiding the City, the SMA and the community in ensuring that this project has the least adverse impacts on the community as possible.

Nearly all Planning Commissioners have participated in reviewing specific sections of the DEIS; along with several MRP/Design Commission members. Commissioners have reviewed the DEIS from their diverse perspectives and, importantly, from their role as a primary steward of the City's Comprehensive Plan and of its neighborhood plans.

We hope this summary will be useful to citizens, the City and the SMP in seeing all of our recommendations in one place.

Sincerely,

John Owen
Chair

OVERALL COMMENTS

Overall Recommendations for Additions to the FEIS:

- Include City Plans and Policies element to the EIS.
- Expand the FEIS to include a broader analysis of impacts and mitigation measure.
- Include a summary of impacts by topical area, and segment, including potential mitigation measures.
- Address the possibility of fewer stations and any new station locations (e.g. Broad Street), identifying impacts to that location and impacts on other nearby stations.
- Include a commitment to preparation of a Supplemental EIS after the DBOM contract is selected and preliminary engineering studies/analyses are completed. This will ensure that all impacts are addressed including those that can be identified only at that later point in the development process.
- Identify a clear threshold or standard for determining when impacts require some type of mitigation – a tool that the community, the City and SMP can all use to monitor the project as it moves forward.
- Articulate the SMP's commitment to a process by which the community, the City and other stakeholders can get information and petition for mitigation of impacts that meet an established threshold in the FEIS.

SPECIFIC COMMENTS

Transportation: Summary of Recommendations for the FEIS

- Provide a more thorough analysis of ridership, including clear information regarding the sources of ridership and use of a methodology that includes more conservative estimates. The FEIS should also include an assessment of mitigating measures should reflect more conservative ridership outcomes.
- Acknowledge the risk and possibility of less than desired/needed transit service and connections, then analyze and estimate the consequences from this area of risk in detail. Address impacts arising from lower than anticipated reallocation of transit service, including identifying mitigation measures.
- Address the challenge of optimizing traffic movements while extending signal time for pedestrians to cross the street.
- Address ADA concerns at stations; explain the specific impacts of the columns on sidewalk width and its impact on pedestrian movement, and identify mitigation measures.
- Consider using more sensitive traffic circulation software (e.g. SimTraffic) for the two primary corridors that could be losing one lane of capacity; provide results of this analysis in the FEIS.
- More thoroughly examine parking impacts including park and hide impacts, loss of parking due to new or relocated bus stops/zones at stations, and loss of revenues from metered parking displaced by columns or bus zones. Identify mitigation tools to use where the City and the community seek to limit such parking impacts on residential and small business uses.

- Replace images used in the DEIS to clearly show impacts to sidewalks, traffic circulation and parking.
- Bike and pedestrian impacts, integral parts of the transportation network should be carefully described and analyzed in the FEIS.
- Address impacts on freight mobility, including identification of mitigation measures.
- Identify and assess cumulative transportation impacts along the key corridors, including mitigation measures.
- The “Traffic Safety” analysis for all segments should be studied further and should identify and address site distance and U-turns impacts along the corridor and at stations.
- Add visual images that show transportation impacts of various alignment alternatives.
- Add the Alaskan Way Viaduct and Sound Transit tunnel projects in the assessment of “planned Transportation Improvements” and address any potential impacts.

Displacements and Relocation: Summary of Recommendations for the FEIS

- Identify and address impacts from the power substations, providing as definitive information as possible regarding displacement and replacement.
- Identify and address impacts from temporary property takes for construction.
- Include an estimate of construction staging requirements and their impacts regarding displacement/replacement of property and businesses or residences.
- Include a commitment to specific amounts of lead time to property owners and businesses, allowing them sufficient time to plan for appropriate relocation.
- Include information and analysis that acknowledge and address the characteristics of businesses that affect their being displaced and relocated. This assessment should be included the Displacement /Relocation and the Economic sections.
- Make a commitment and provide an outline in the FEIS of a handbook on Displacement and Relocation to provide a clear process and timeline for dealing with displacement and relocation.

Land Use and Neighborhoods: Summary of Recommendations for the FEIS

- Identify potential land use impacts (e.g. Interbay QFC Displacement) and identify mitigation that could be implemented to address this impact as well as other similar impacts in other station areas.
- Include a more detailed analysis of the impact of the guideway where it is passing by buildings.
- Include a more detailed description and analysis of neighborhood plans, including the consistency of the Monorail project with goals and recommendations and impacts that the project may have in implementing those goals and recommendations.
- Determine station areas where more than ¼ mile radius is merited for analysis of potential impacts; carry out additional analysis as needed.
- Include analysis of the impact of the monorail guideway on adjacent buildings – on both residential and commercial uses.

Economics: Summary of Recommendations for the FEIS

- The Final EIS must include a significantly expanded Economics section that identifies all potential adverse economic impacts; analyze the nature and scope of impact, including actual cost estimates. It should also identify potential mitigation strategies.

Visual Quality and Aesthetic Resources: Summary of Recommendations for FEIS

- Reference or state City policy or design guidelines related to view corridor, urban design, streetscape or other aesthetic or pedestrian quality objectives. At the very minimum, these should be used as one measure for determining the level and significance impacts and as a threshold for determining appropriate mitigation.
- Add a clear definition of “significant unavoidable adverse impacts” as it applies to visual quality and views.
- Provide a much more thorough analysis of adverse impacts on views and aesthetics as noted above (e.g. impacts on 2nd avenue streetscape, on views of historic buildings, along designated view corridors)
- Include a detailed description and analysis of impacts regarding the intended function of Second Avenue and identify mitigation measures.
- Add to the inventory and analysis views of key buildings and spaces along 2nd Avenue, and Alaska and California Junction.
- Address adverse impacts that the massing, bulk and scale of columns will have through lower scale parts of downtown and through the smaller scale neighborhoods along the line.
- Include discussion of additional aesthetic elements that will impact the street-level experience of pedestrians and riders alike. These include a) street lighting and lighting around stations at night; b) accurate assessment of shading at the street level by the guideway, columns and stations; c) trash associated with monorail stations; d) trees and other vegetation; e) “noise cowling” and what that looks like; and f) the visual impact of advertising on the trains and at stations.
- Add reference and confirm earlier commitment to making the monorail structure a significant piece of civic architecture.

Air Quality: Summary of Recommendations for FEIS

- Provide more detailed information and rationale for conclusions regarding the lack of air quality impacts from the monorail and related traffic activities.

Noise and Vibration: Summary of Recommendations for the FEIS

- Provide an analysis of noise impacts on the working environment in buildings adjacent to the monorail guideway, including the impact of horn sounding. Identify appropriate mitigation measures.
- Include an analysis of noise generated at traction power stations, of noise vibrations and their impact on adjacent historic buildings, performance halls such as Benaroya Hall, from bus layover stations.
- Clarify methodology used to compute noise levels, including consideration of operations in curves, changes in grade, etc.
- Provide more detailed assessment of the effectiveness of mitigation measures, applied both individually and cumulatively.

Energy: Summary of Recommendations for the FEIS

- Provide a detailed analysis of impacts resulting from peak use of energy and the possible longer term need for additional power to serve the Green Line system.
- Analyze the impact on City Light rates and identify/assess potential mitigation measures including estimated cost and effectiveness.
- Provide a detailed analysis of the impacts of monorail power substations.

Public Services and Utilities: Summary of Recommendations for FEIS

- Provide more detailed description and analysis of impacts of the guideway on fire safety for buildings adjacent to the guideway.
- Provide more detailed description and analysis of public safety impacts along the guideway, particularly between stations. Mitigation measures should be identified, including coordination with Seattle Police Department (SPD) for monitoring the areas, lighting, design features and connections with adjacent uses.

Parks and Recreation: Summary of Recommendations for FEIS

- Provide more thorough analysis of impacts to Longfellow Creek and Stadium Park, focusing on consistency with the neighborhood plan as well as specific environmental and park access aspects.
- Provide more detailed analysis of impacts to the following parks/recreation areas, including specific mitigation measures where applicable: Interbay P-Patch, Kinnear Park, Seattle Center and Pioneer Square Park

Cultural Resources: Summary of Recommendations for FEIS

- Overall provide results of a more detailed analysis of impacts to cultural resources along the alignment.
- Specifically add a more detailed analysis of impacts on Pioneer Square as a district as well as to key buildings such as the Smith Tower. Identify mitigating measures to address these impacts.
- Carry out additional analysis of impacts on historic properties along 2nd and 4th Avenues in the downtown segment and on the Great Northern Roundhouse in Interbay.
- Address potential vibration impacts during construction on Pioneer Square areaways; identify potential mitigation measures.

Environmental Health: Summary of Recommendations for the FEIS

- Include soil contamination information obtained from geo-technical borings, describing, at a minimum, site-specific conditions at potential “trouble spots”.
- Include a description of actions and commitments that would take place during construction activities to avoid and minimize environmental health impacts, including effects on the movement of contamination in groundwater, potential releases into the environment, and potential health exposure.

Earth: Summary of Recommendations for the FEIS

- Provide more detailed information and analysis of geological/earth impacts related to potential guideway and station designs.

Water Quality: Summary of Recommendations for FEIS

- Provide more thorough analysis regarding potential adverse water quality effects, including assessment of the impacts from the equipment proposed for use.
- Provide more detailed analysis of potential pollutants from monorail operations, including the evaluation of potential releases of contamination due to SMP operations.
- Provide supporting analysis for conclusion guideway operation would not adversely affect water quality.

Plants and Animals: Summary of Recommendations for the FEIS

- Include analysis and evaluation of impacts to bald eagle, osprey, and falcon activity along the proposed route, particularly in the SW Spokane Street corridor.
- Provide more detailed analysis of impacts to the West Seattle greenbelt for the Pigeon Point alternative.

- Provide more detailed evaluation of the net adverse impacts from new structures in the Ballard area of the Lake Washington Ship Canal
- Acknowledge the need for compensation of altered aquatic habitat; provide an appropriate commitment to mitigation actions.

Construction: Summary of Recommendations for the FEIS

- Add more detailed description and analysis of impacts for construction staging in Segment 3, 4 and 6 (Queen Anne/Seattle Center/Belltown, Downtown and West Seattle segments).
- Describe in detail how historic buildings in the vicinity of the Green Line would be impacted, including potential damage more fragile facades of historic structures.
- Provide detailed information about specific mitigation measures, impact thresholds that will trigger mitigation, efforts to measure and monitor project development or construction impacts, and means for keeping interested parties informed about the results of ongoing monitoring efforts.
- Consider committing to a Supplemental EIS that would address more specific construction impacts and mitigation, as well as evolving elements of project engineering or scope, at some point after the negotiation of the DBOM contract is signed and the details have been negotiated and specified.
- Include in the identification of mitigation measures for construction impacts, an assessment of the City's capacity to provide any assumed resources and responsibilities.

Cumulative Impacts: Summary of Recommendations for the FEIS

- Include an analysis of economic and land use impacts of the loss of property, the juxtaposition of loss of parking and the potential for increased parking demand at some station areas, and overall impacts to visual quality and views along the corridor, but particularly in the downtown segment. Identify appropriate potential mitigation measures.
- Include an analysis of cumulative traffic circulation impacts along key corridors of the SMP alignment; identify potential mitigation measures.